

February 22, 2005

Eric Michielssen
Clark Valley Farm
2310 Clark Valley Rd.
Los Osos, CA 93402

To: Francine Torres
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW
Room 4008-So, Ag Stop 0268
Washington, DC 20250-0200

Fax to: 202-205-7808 or email to francine.torres@usda.gov

Re: Approve Ferric Phosphate for use in organic farming.

Date of Review: February 28th – March 3, 2005

As an organic grower I'm encouraging you to approve Ferric Phosphate for inclusion on the National List and use in organic farming. I am against the two TAP reviewer's recommendations of not allowing Ferric Phosphate for use as a molluscicide. Ferric Phosphate occurs naturally in soil and has no known harmful effects on other organisms. Current organically approved methods cited as alternatives are not practical for organic farming.

I/We operate an organic fruit and vegetable farm of 80 acres in Los Osos, CA. Slugs and snails are major pests on my/our farm. Last year I lost nearly 50% of my strawberry crop to slugs and snails. I am already seeing a huge increase this year already in the new strawberry fields and in my lettuce and brassica crops. We stand to lose over \$5,000-10,000 this year unless we are able to use this organic and effective molluscicide.

Currently, there are no effective organically approved slug/snail control methods. Other methods such as copper banding, trapping, decoy plantings or diatomaceous earth are neither practical nor effective on a production farm of this acreage and do not significantly reduce slug/snail damage within the field. I/we do not use these methods on our farm.

Organic growers need to have effective tools at our disposal. Lack of an organic slug and snail bait costs us money every year. Please ensure that Ferric Phosphate is approved for use as a molluscicide in organic farming.

Sincerely,

Eric Michielssen
www.clarkvalleyfarm.com

From: BIGE48@aol.com%inter2 [BIGE48@aol.com] on behalf of BIGE48@aol.com
Sent: Tuesday, February 22, 2005 8:17 PM
To: Torres, Francine
Subject: please support sluggo

Attachments: ATTACHMENT.TXT; actionletterferricphos2.doc

Ms. Torres,

Our farm in Los Osos, CA. near the coast of central California is a cool, humid area perfect for slugs and snails. Last year we lost half our strawberry crop and had some damage to our lettuce. This year we are seeing many more slugs in our new seedling trays. It is hard to pick them off my hand and squash them. There are just too many. We do not use any form of pesticide on our farm, not even organically approved ones, but we cannot address this slug program adequately.

Please support the adoption of Sluggo as an approved organic molluscicide.

Thank you very much.

Sincerely,

Eric Michielssen
www.clarkvalleyfarm.com
email: also ericm@clarkvalleyfarm.com